

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

<p>(1) FRANK A. STIE,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>(1) GREEN COUNTRY AIRCRAFT, LLC, a domestic for profit company, (2) GREEN COUNTRY AIRCRAFT EXHAUST, INC., a Domestic or profit company,</p> <p style="text-align: center;">Defendants.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>CASE NO. 17-CV-00287-JED-FHM</p>
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NOTICE OF REMOVAL

Defendants, Green Country Aircraft, LLC and Green Country Aircraft Exhaust, Inc. (collectively referred to as “Green Country”), pursuant to 28 U.S.C. §1441 and §1446, respectfully submit this Notice of Removal and in support hereof, allege and state as follows:

1. On May 5, 2017, Plaintiff filed his Petition in the District Court for Tulsa County, State of Oklahoma, styled *Frank A. Stie v. Green Country Aircraft, LLC and Green Country Aircraft Exhaust, Inc.*, Case No. CJ-2017-1772. The summons was served on Green Country Aircraft Exhaust, Inc. on May 15, 2017 and on Green Country Aircraft, LLC on May 18, 2017. A copy of the state court docket sheet, together with copies of all process, pleadings, and orders filed in the case and served on Defendants are attached hereto as Exhibit “A.”

2. Plaintiff’s Petition, on its face, asserts claims that arise under the laws of the United States. Specifically, Plaintiff asserts violation of the Age Discrimination in Employment Act, 29 U.S.C. §§621 et seq.

3. Accordingly, this action is removable pursuant to 28 U.S.C. §1441(c)(A), which permits any civil action brought in any state court in which the district courts of the United States

have original jurisdiction, such as cases involving federal questions, to be removed to the district court of the United States for the district where the state court action is pending.

4. This Notice of Removal is being filed within thirty (30) days after service of the Petition on the Defendants, as required by 28 U.S.C. §1446(b).

5. A copy of this Notice of Removal will be filed with the Clerk of the District Court in and for Tulsa County, State of Oklahoma and served upon all adverse parties, as required by 28 U.S.C. §1446(d).

For the above reasons, the Defendants hereby give notice of removal of this action pending in the District Court in and for Tulsa County, State of Oklahoma.

Respectfully submitted,

s/ R. Tom Hillis

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Attorneys for the Defendants,
Green Country Aircraft, LLC and Green Country
Aircraft Exhaust, Inc.

CERTIFICATE OF MAILING

I hereby certify that on this 22nd day of May, 2017, a full, true and correct copy of the above and foregoing instrument was mailed, with proper postage prepaid thereon, to the following:

Daniel E. Smolen
Lauren G. Lambright
Smolen, Smolen & Roytman, PLLC
701 S. Cincinnati Ave.
Tulsa, Oklahoma 74119

s/ R. Tom Hillis

R. Tom Hillis